AMENDMENTS TO THE DRAWINGS

The attached sheet of annotated marked-up drawings include changes to FIGURE 7. A replacement sheets is also attached. The "YES" and "NO" branches of item 108 have been switched to correspond to the disclosure of the specification and correct a previous typographical error.

REMARKS

This Application has been reviewed carefully in light of the Office Action mailed August 23, 2005 ("*Office Action*"). Claims 1-53 were pending in the Application and stand rejected. Applicants amend Claims 1, 7, 14, 20, 25, 33, 41, and 47 and retract previous amendments. Applicants respectfully request reconsideration and favorable action in this case.

I. Claim Rejections – 35 U.S.C. §102

The Examiner rejects Claims 1-3, 6-8, 10, 12, 14, 15, 17-21, 24-30, 33-37, 41, 42, 44-48, and 50-53 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 5,946,634, which issued to Korpela, et al. ("*Korpela*"). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. §2131. Applicants respectfully traverse this rejection and submit that *Korpela* does not describe, expressly or inherently, each and every limitation of the claims. Consider Applicants' independent Claim 1, which recites:

> A configurable telecommunications system, comprising:
>
> an interface device having a plurality of telephony resources and operable to maintain a local protocol database comprising a plurality of protocol modules, to identify, for each of the telephony resources, a protocol module required to process signals received by the telephony resource, to determine, for each of the identified protocol modules, whether the identified protocol module is valid in the local protocol database, to request each of the protocol modules not determined valid from a system controller, to receive the requested protocol modules from the system controller, and to store the requested protocol modules in the local protocol database, and to handle parallel signaling for each of the telephony resources using the protocol module required for that one of the telephony resources; and
>
> the system controller operable to maintain a system protocol database storing a plurality of master protocol modules, to receive requests from the interface device requesting selected ones of the master protocol modules, and to communicate the requested master protocol modules from the system protocol database to the interface device.

Applicants respectfully submit that *Korpela* fails to teach every element of this claim.

In general, *Korpela* discusses a mobile device able to download an appropriate protocol for communication with a selected backbone network. (col. 2, lines 32-37). The protocol used by the mobile device of *Korpela* is reprogrammable such that it may

communicate with a backbone network using the protocol employed by the backbone network. (col. 2, lines 46-58).

A. *Korpela* fails to teach an interface device having a plurality of telephony resources.

Among other aspects, *Korpela* fails to disclose "an interface device having a plurality of telephony resources," as required by Claim 1. The Examiner previously responded to Applicants' analysis in an Office Action mailed January 7, 2005 ("*Previous Office Action*"), stating:

> Applicant argues (Remarks, page 17) that Korpela fails to describe "an interface device having a plurality of telephony resources". Furthermore, Korpela fails to describe an interface device that is operable "to identify, for each of the telephony resources, a protocol module required to process signals received by the telephony resource." Examiner respectfully disagrees with Applicant [sic] contention. Korpela clearly discloses an interface device (10), a plurality of telephony resources (a loudspeaker, a microphone, keypad, an LCD, I/O port, a voice call, a data session, fax, videophone). When a user wishes to initiate a session, either a voice call or a data session using a computer, fax or videophone connected to the I/O port, the terminal control device 15 determines the type of session and selects the best available protocol to use (column 7, lines 35-51).

(*Previous Office Action*, pg. 8). Applicants appreciate the Examiner's consideration of and response to Applicants' previously submitted argument with respect to *Korpela*. However, Applicants respectfully maintain that *Korpela* fails to disclose "an interface device having a plurality of telephony resources." Consider that Claim 1, in addition to requiring multiple telephony resources, also requires that the interface device must be operable "to identify, for each of the telephony resources, a protocol module required to process signals received by the telephony resource."

As teaching a plurality of telephony resources, the present *Office Action* again points to a list of components disclosed by *Korpela*. However, Applicants respectfully submit that a loudspeaker, a microphone, a keypad, an LCD, an I/O port, a voice call, a data session, a fax, and a videophone are not a plurality of telephony resources as required by Claim 1. Claim 1 requires an interface device operable "to identify, for each of the telephony resources, a protocol module required to process signals received by the telephony resource." (emphasis

added). The cited components of *Korpela* (e.g., loudspeaker, microphone, etc.) do not receive signals that are processed by a "protocol module."

As teaching "a protocol module . . . to process signals received by the telephony resource," the *Office Action* first points to *Korpela*, column 5, lines 21-30, which recites:

> FIG. 6 illustrates schematically the content of the protocol code files 151, 152 and their relation with other elements of the signaling control software within the terminal 10. Under the control of a management program (provided by the processor 150) the DSP device 13 selectively applies one of the protocol code files 151, 152, 153, in combination with code 131 which implements layers 1 and 2 (the physical layer, the logical link sub-layer and the link control MAC layer) of the radio access system.

(*Korpela*, col. 5, lines 21-30). The *Office Action*, thus, apparently asserts that the protocol modules are taught by the protocol code files (151, 152, 153) stored in the mobile unit (10). *Korpela* teaches that the protocol code files are used to communicate with various backbone networks (30a, 30b, 30c) through various radio access networks (20a, 20b, 20c). (Abstract). *Korpela* does not teach that the protocol code files process signals received by "a loudspeaker, a microphone, keypad, an LCD, I/O port, a voice call, a data session, fax, [and] videophone." Thus, these components of *Korpela* cannot teach "a plurality of telephony resources," as required by Claim 1.

Therefore, *Korpela* does not describe, expressly or inherently, "a plurality of telephony resources," as required by Claim 1. Independent Claims 7, 14, 20, 25, 33, 41, and 47 include limitations that, for substantially similar reasons, are not taught by *Korpela*. Because *Korpela* does not disclose, expressly or inherently, every element of independent Claims 1, 7, 14, 20, 25, 33, 41, and 47, Applicants respectfully request reconsideration and allowance of Claims 1, 7, 14, 20, 25, 33, 41, and 47 and their respective dependent claims.

B. *Korpela* fails to teach an interface device operable to handle parallel signaling for each of the telephony resources using the protocol module required.

Claim 1 requires an interface device operable "to handle parallel signaling for each of the telephony resources using the protocol module required for that one of the telephony resources." *Korpela* fails to teach these claimed aspects.

Korpela only teaches one component of mobile unit (10) that is used to communicate with a radio access network (20): the RF section (12) through the RF antenna (11). (col. 4,

lines 9-13). *Korpela* specifies that "the mobile terminal is . . . able to select one of a plurality of different higher level protocols for data transmission over the physical layer, and to select a corresponding one of said backbone networks for communication, in dependence upon the transmitted network identifier signals." (col. 2, lines 32-37). Thus, at any given time, *Korpela*'s mobile unit (10) uses one RF antenna (11) to communicate with one backbone network (30) using one protocol stored in one protocol code file (151-53).

Therefore, *Korpela* does not describe, expressly or inherently, an interface device operable "to handle parallel signaling for each of the telephony resources using the protocol module required for that one of the telephony resources," as required by Claim 1. Independent Claims 7, 14, 20, 25, 33, 41, and 47 include limitations that, for substantially similar reasons, are not taught by *Korpela*. Because *Korpela* does not disclose, expressly or inherently, every element of independent Claims 1, 7, 14, 20, 25, 33, 41, and 47, Applicants respectfully request reconsideration and allowance of Claims 1, 7, 14, 20, 25, 33, 41, and 47 and their respective dependent claims.

C. The dependent claims include additional patentable limitations.

For example, consider Claim 6, which recites:

> The system of Claim 1, wherein the interface device is further operable to process signals received using a core signal handler in combination with a selected protocol module from the local protocol database.

Among other aspects, *Korpela* does not disclose a "core signal handler" or that the interface device is operable "to process signals received using a core signal handler in combination with a selected protocol module from the local protocol database," as required by Claim 6.

As teaching these claimed aspects, the *Office Action* cites to *Korpela*, column 5, lines 9-30. This portion of *Korpela* describes the structure of the control device (15) and the content of protocol code files (151, 152). (col. 5, lines 9-30). Applicants respectfully submit that this portion of *Korpela* makes no mention of an interface device operable to process signals received using anything, much less a core signal handler that works in combination with other protocol modules. Thus, *Korpela* cannot teach an interface device operable "to process signals received using the core signal handler in combination with a selected protocol module from the local protocol database."

Therefore, *Korpela* fails to describe, expressly or inherently, all limitations of Claim 6. While not expressly discussed, other dependent claims provide further patentable limitations. Applicants respectfully request reconsideration of these limitations and allowance of the claims.

II. Claim Rejections – 35 U.S.C. §103

A. Claim 13 is patentable over *Korpela*.

The Examiner rejects Claim 13 under 35 U.S.C. §103(a) as unpatentable over *Korpela*. Applicants respectfully submit that *Korpela* fails to teach or suggest all limitations of this claim. Claim 13 recites:

> The telecommunications device of Claim 7, wherein the controller is further operable to:
> process signals associated with a communication session using a first version of a specific protocol module stored in the protocol database;
> receive an updated version of the specific protocol module during the communication session;
> store the updated version of the specific protocol in the protocol database;
> complete processing of the communication session using the first version of the specific protocol module; and
> remove the first version of the specific protocol module after processing of the communication session is complete.

As described above, Applicants have shown that *Korpela* fails to disclose all limitations of independent Claim 7, from which Claim 13 depends. Accordingly, *Korpela* fails to teach or suggest all limitations of Claim 13 because this dependent claim incorporates the limitations of its independent claim. Because *Korpela* fails to teach or suggest all limitations of Claim 13, Applicants respectfully request reconsideration and allowance of Claim 13.

Also, Claim 13 includes additional patentable limitations over *Korpela*. Among other aspects of Claim 13, *Korpela* fails to teach or suggest a controller operable to "receive an updated version of the specific protocol module during the communication session," as required by Claim 13. The *Office Action* acknowledges that *Korpela* "does not expressly disclose receiving an updated version of protocol module during a communication session." (*Office Action*, pg. 7). However, the *Office Action* continues by stating:

> It would have been obvious to one ordinary skill in the art at the time the invention was made to add a method that update and store the specific

> protocol in the protocol database during communication session in the system of Korpela. Doing so would provide seamless telephone service that support multiple or different protocol. [sic]

(*Office Action*, pg. 7). Applicants respectfully disagree. Claim 13 provides a method for handling the receipt of an updated protocol module while that module is in use. *Korpela* fails to even identify or acknowledge this type of operation, let alone discuss how such an operation could be accomplished. Moreover, *Korpela* fails to mention providing "seamless telephone service," the Examiner's reasoning for the proposed combination. To the extent that the Examiner maintains this assertion based on "Official Notice," "well known prior art," "common knowledge," or other information within the Examiner's personal knowledge, Applicants respectfully request a reference to be cited in support of this position or provide an affidavit in accordance with M.P.E.P. § 2144.03 and 37 C.F.R. § 1.104(d)(2).

For at least these reasons, *Korpela* fails to teach or suggest all limitations of Claim 13. Accordingly, Applicants respectfully request reconsideration and allowance of Claim 13.

B. Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49 are patentable over *Korpela* in view of *Kim*.

The Examiner rejects Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49, under U.S.C. §103(a) as unpatentable over *Korpela* in view of U.S. Patent No. 6,426,963, which issued to Kim ("*Kim*").

As described above, Applicants have shown that *Korpela* fails to disclose all limitations of independent Claims 1, 7, 14, 20, 25, 33, 41, and 47. Accordingly, *Korpela* fails to teach or suggest all limitations of Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49 because these dependent claims incorporate the limitations of their respective independent claims. *Kim* fails to remedy the deficiencies of *Korpela*.

Thus, *Korpela* and *Kim*, whether taken alone or in combination, fail to teach or suggest all limitations of Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49. Because the references fail to teach all limitations of the claims, Applicants respectfully request reconsideration and allowance of Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49.

CONCLUSION

Applicants have made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Although no fees are believed to be currently due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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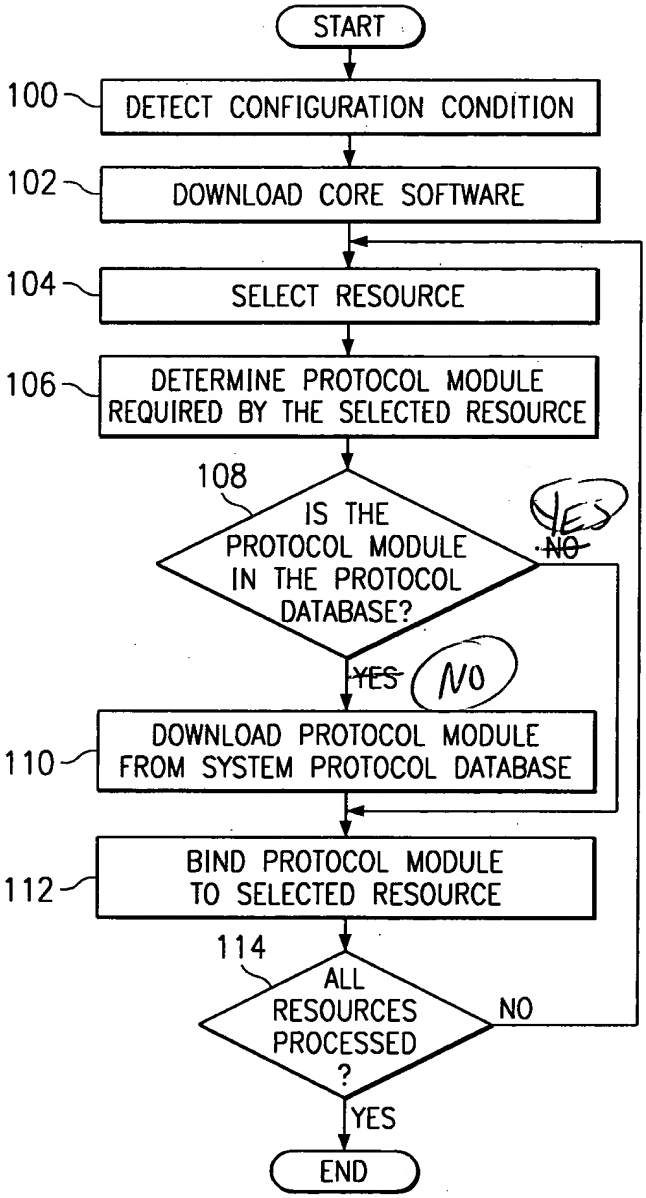

FIG. 7

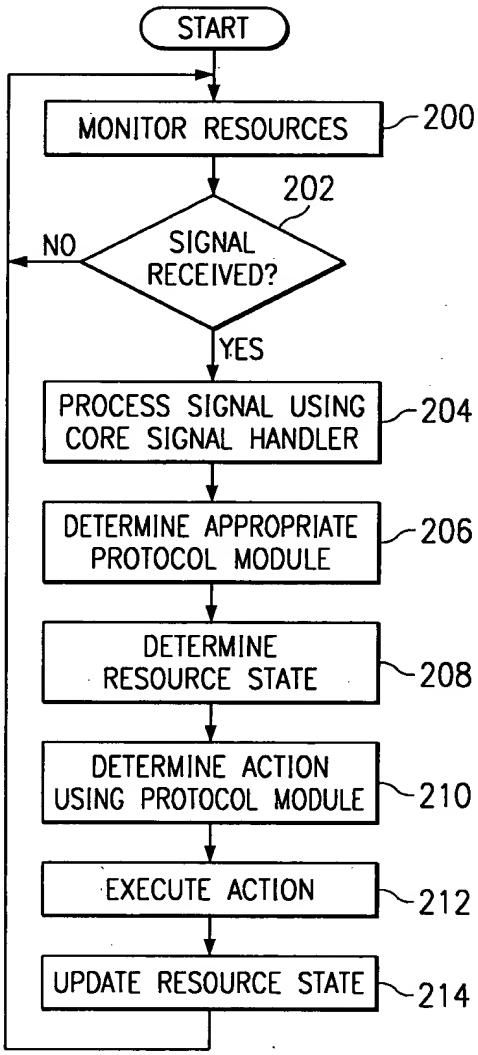

FIG. 8